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                    UNITED STATES DISTRICT COURT
14
          NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
15

16 CHASOM BROWN, MARIA NGUYEN,   Case No. 5:20-cv-03664-LHK
    and WILLIAM BYATT, individually and on
17 behalf of all similarly situated,   **STIPULATION OF VOLUNTARY**
                                          DISMISSAL OF DEFENDANT
18   Plaintiffs,   **ALPHABET, INC. WITHOUT**
                                          PREJUDICE; [PROPOSED] ORDER
19   v.

20 GOOGLE LLC and ALPHABET INC.,   Judge: Honorable Lucy H. Koh

21   Defendants.

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1   This stipulation is entered into between Plaintiffs and Alphabet Inc. ("Alphabet"),

2 collectively referred to as the "Parties."

3   WHEREAS, Plaintiffs filed their Class Action Complaint on June 2, 2020, against Google

4 LLC ("Google") and Alphabet, alleging violations of federal and state privacy laws;

5   WHEREAS, Alphabet represents that it is a holding company only and does not provide to

6 putative class members any of the Google products or services identified in the Complaint; and

7   WHEREAS, Plaintiffs and Alphabet have entered into a separate agreement to toll the

8 running of any statute of limitations, laches, and/or any statute of repose.

9   NOW THEREFORE, pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs hereby

10 dismiss all claims, *without* prejudice, against defendant Alphabet. Pursuant to agreement, the parties

11 agree to bear their own fees and costs.

12

13 DATED: August 19, 2020   BOIES SCHILLER FLEXNER LLP

14
                                     By_____/s/ Mark C. Mao_____
15   Mark C. Mao
                                          Counsel on behalf of Plaintiffs
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17 DATED: August 19, 2020   QUINN EMANUEL URQUHART &
                                     SULLIVAN, LLP
18
                                     By_____/s/ Andrew H. Schapiro_____
19   Andrew H. Schapiro
                                         Counsel on behalf of Alphabet
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22   **CIVIL LOCAL RULE 5-1(i)(3)**

23   *Pursuant to Civil Local Rule 5-1(i)(3), the filer, Marc C. Mao, attests that concurrence in*

24 *the filing of this document has been obtained from each of the signatories hereto.*

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26   By_____/s/ Mark C. Mao_____
                                        Mark C. Mao
27   *Counsel on behalf of Plaintiffs*

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[PROPOSED] ORDER

2   Pursuant to stipulation, and for good cause shown, the Court hereby **ORDERS:**

3   1.   All claims in *Brown, et. al* v. *Google LLP*, No. 5:20-cv-03664-LHK (N.D. Cal.)

4   against named defendant Alphabet Inc. are hereby dismissed without prejudice.

5   2.   Plaintiffs and defendant Alphabet Inc. shall each bear their own fees and costs related

6   hereto.

7   **IT IS SO ORDERED.**

8   DATED: _____, 2020   _____

9   Hon. Lucy H. Koh
                                                                           United States District Judge

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STIPULATION OF VOLUNTARY DISMISSAL OF DEFENDANT ALPHABET INC.
WITHOUT PREJUDICE; [PROPOSED] ORDER